

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF TENNESSEE  
AT CHATTANOOGA

FILED  
FEB 23 2021  
Clerk, U. S. District Court  
Eastern District of Tennessee  
At Chattanooga

UNITED STATES OF AMERICA )

v. )

ANDREW CALHOUN, a.k.a. )

ANDREW CALHOUNXAYADETH )

No. 1:21-CR-10

JUDGES McDonough / Lee

INDICTMENT

COUNT ONE

The Grand Jury charges that, starting in or about June 2020 and continuing until in or about July 2020, within the Eastern District of Tennessee and elsewhere, the defendant, ANDREW CALHOUN, a.k.a. ANDREW CALHOUNXAYADETH, did unlawfully and knowingly distribute child pornography, and unlawfully and knowingly did cause another person to distribute child pornography, in or affecting interstate commerce by any means, including by computer, that is: video files depicting minor and prepubescent children engaging in sexually explicit conduct including but not limited to adult males engaging in oral and anal sex with prepubescent, infant, and minor children, and the lascivious exhibition of the genitals and pubic areas of prepubescent, infant, and minor children.

In violation of Title 18, United States Code, Sections 2252A(a)(2)(A), 2256(8)(A)) and 2.

FORFEITURE ALLEGATIONS

The allegation contained in Count One of this Indictment is hereby realleged and incorporated by reference for the purpose of alleging forfeiture pursuant to Title 18, United States Code, Section 2253.

Pursuant to Title 18, United States Code, Section 2253, upon conviction of an offense in violation of Title 18, United States Code, Section 2252A, the defendant shall forfeit to the United States of America:

- a. Any visual depiction described in Title 18, United States Code, sections 2251, 2251A, or 2252, or any book, magazine, periodical, film, videotape, or other matter which contains any such visual depiction, which was produced, transported, mailed, shipped or received in violation of Title 18, United States Code, Chapter 110;
- b. Any property, real or personal, constituting or traceable to gross profits or other proceeds obtained from the offense; and
- c. Any property, real or personal, used or intended to be used to commit or to promote the commission of the offense.

The property to be forfeited includes but is not limited a BLU Android Model G9.

If any of the property described above, because of any act or omission of the defendant:

- a. cannot be located upon the exercise of due diligence;
- b. has been transferred or sold to, or deposited with, a third party;
- c. has been placed beyond the jurisdiction of the court;
- d. has been substantially diminished in value; or
- e. has been commingled with other property which cannot be divided without difficulty,

the United States of America shall be entitled to forfeiture of substitute property pursuant to Title 21, United States Code, Section 853(p), as incorporated by Title 18, United States Code, Section 2253(b).

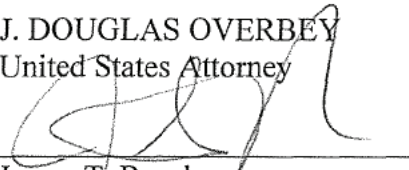
[SIGNATURE ON FOLLOWING PAGE]

A TRUE BILL:

  
GRAND JURY FOREPERSON

J. DOUGLAS OVERBEY  
United States Attorney

By:

  
James T. Brooks  
Assistant United States Attorney